

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEANETTE MELLERSON)	
)	
)	
Plaintiff,)	Civil Action No.: L-01-2090
)	
v.)	
)	
JOANNE B. BARNHART,)	
Commissioner)	
Social Security Administration)	
)	
Defendant.)	

* * * * *

DECLARATION OF TRACEY GANN TURNER

I, Tracey Gann Turner, hereby declare as follows:

Supplemental Legal Services Provided By Piper Rudnick L.L.P.

1. I incorporate the information set forth in my declaration on November 14, 2003 in support of this Supplemental Petition for an Award of Attorneys' Fees and Costs.

2. In my role as the senior Piper Rudnick L.L.P. ("Piper Rudnick") attorney working on the case, I directed the strategy for responding to Defendant's Opposition to Plaintiff's Petition for Attorneys' Fees and Costs; edited the Reply Brief; and made final determinations for Piper Rudnick as to the form and substance of the Reply Brief.

3. Piper Rudnick is seeking compensation for a total of 4.8 hours of time Ms. Turner expended on drafting the Reply Brief, which is valued at \$1,800.00 (\$375/hr.). Contemporaneous billing records reflecting the time expended on this case for which compensation is sought are included in Exhibit C.


4. The fees for which Piper Rudnick is not seeking reimbursement total \$6,525.00; some of the time expended by Piper Rudnick for which compensation is not sought represents time expended on preliminary research and drafting; certain time devoted to intra-office and inter-office collaboration; and time expended on responding to Defendant's arguments related to the reasonableness of Piper Rudnick's and the Committee's attorneys' fees.

5. In the further exercise of billing judgment, Piper Rudnick is reducing the amount for which it seeks compensation (\$1,800.00) by 20% (\$360.00) to ensure that the requested fee total represents a truly conservative calculation of the time spent working on the Reply Brief and to ensure that the supplemental fee petition cannot be criticized for inadvertently including time that is unnecessary or duplicative. Therefore, the total fees claimed by Piper Rudnick with respect to the drafting of the Reply Brief are \$1,440.00.

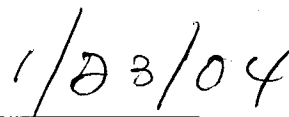
Costs

6. Piper Rudnick's expenses related to drafting the Reply Brief total \$127.93. All of Piper Rudnick's disbursements for which compensation is sought are of types that are normally billed to Piper Rudnick's clients – duplication expenses, postage and courier expenses, telephone charges and computer printing expenses. An itemized description of the expenses for which the Committee is seeking reimbursement is set forth in Exhibit D.

I HEREBY DECLARE AND AFFIRM UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS CONTAINED IN THIS AFFIDAVIT ARE TRUE AND CORRECT.



Tracey Gann Turner



Date